

respect to mass market services.

#### IV. CONCLUSION

For all of these reasons, the Commission should reconsider its arbitrary and capricious decision to eliminate the public information disclosure requirement for mass market interstate, interexchange services. Prompt reinstatement of the information disclosure requirement will serve the public interest by ensuring that consumers have access to accurate and adequate information to make their long distance service choices. In addition, a reinstated information disclosure requirement will provide consumers with sufficient information to identify and bring to the Commission's attention possible violations of the geographic rate averaging and rate integration provisions of Section 254(g) of the Communications Act -- violations that the Commission acknowledges can occur in a competitive market such as this one.

Respectfully submitted,

#### THE UTILITY REFORM NETWORK

By:  
Thomas J. Long  
Senior Telecommunications Attorney  
THE UTILITY REFORM NETWORK  
711 Van Ness Avenue, Suite 350  
San Francisco, CA 94102  
(415) 929-8876

#### TELECOMMUNICATIONS MANAGEMENT INFORMATION SYSTEMS COALITION

By:  
Cheryl A. Tritt  
Joan E. Neal  
Joyce H. Jones  
MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, N.W.  
Suite 5500  
Washington, D.C. 20006  
(202) 887-1500

Its Attorneys

December 4, 1997

[Testimony](#)

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ATTACHMENT  
TO LETTER DATED 10

JAN 17 1998

PAGE: 6 of 6

1479 SEMINOLE AVENUE  
DETROIT, MI 48214-2708

January 15, 1998

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JAN 21 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation  
of Section 254 (g) of the Communications Act of 1934, as amended: CC Docket No. 96-61

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's (FCC) decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available telecommunication services to the public. I support this Petition.

Being a consumer of telecommunications products and services I find it difficult to make an informed decision as to which carrier I should choose. I found the Salestar Web Pricer helpful and informative in choosing my long distance carrier. Since this information is gathered from documents obtained because of the public disclosure requirements, without such information available services like this would disappear.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the FCC Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the FCC Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains.

As a consumer of long distance services, I rely on publicly available pricing information in order to make informed decisions about the telecommunications services I use. The FCC has recognized already in its October 1996 order, that a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousands of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information.

Traditionally consumers have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high-cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Without publicly available pricing information, I along with other consumers will be hard pressed to detect such impermissible price discrimination. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

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I support the Petition for Further Reconsideration filed by the Telecommunications Management Information Systems Coalition and urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,



Geoffrey B. Conley  
763 Miller Ave, Mill Valley, CA 94041

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I support the Petition for Further Reconsideration filed by the Telecommunications Management Information Systems Coalition and urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,

*Joan Duffield*  
JOAN DUFFIELD  
184 MORAGA WAY  
ORINDA, CA. 94563

January 14, 1998

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
Washington, DC 20554  
Re: Policy and Rules Concerning the Interstate, Interexchange  
Marketplace;  
Implementation of Section 254 (g) of the Communications Act of 1934, as  
amended: CC Docket No. 96-61

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available services to the public. Del Mar Arts writes to support the Petition.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains. Consumers of long distance services, both residential and small business, rely on publicly available pricing information in order to make informed decisions about the telecommunications services they need.

As even the FCC recognized in its October 1996 order, a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousand of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an

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FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information. Consumers traditionally have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high- cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Absent the public availability of pricing information, however, consumers will be hard pressed to detect such impermissible price discrimination in the first instance. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. This is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second, the advertising and promotional materials provided by carriers are rarely detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons. Moreover, these materials certainly will not be specific enough to allow consumers to detect--let alone support--a claim of carrier misconduct at the FCC. In short, the information available publicly without a specific Commission requirement will fall far short of meeting consumers' need. Del Mar Arts thus fully supports the Petition and urges the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Very respectfully,



Charlie Clingman  
DBA Del Mar Arts  
Box 2109  
Del Mar, CA 92014

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January 8, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
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I fully support the Petition and urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,

  
Holly Schneider  
2342 Franklin Street  
San Francisco, CA 94123

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January 8, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
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Thank You,

R. Ariz

Roger A. Forzandini  
1416 Grant Ave. #12  
San Francisco, CA 94133

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January 14, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
Washington, DC 20554

Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace;  
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Thank You,

Felicidad Mele  
Public Health Department  
San Francisco  
CA 94107

January 8, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
Washington, DC 20554

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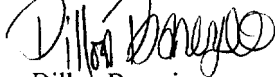
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Thank You,



Dillon Banerjee  
2346 Franklin Street  
San Francisco, CA 94123

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JUN 21 1993

January 15, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

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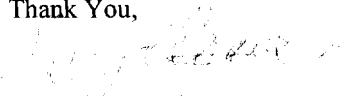


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Thank You,

  
Mary O'Connell  
307 University Ave. #2  
Davis, CA. 95616

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of Section 254 (g) of the Communications Act of 1934, as amended: CC Docket No. 96-61

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's (FCC) decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available telecommunication services to the public. I support this Petition.

Being a consumer of telecommunications products and services I find it difficult to make an informed decision as to which carrier I should choose. I found the Salestar Web Pricer helpful and informative in choosing my long distance carrier. Since this information is gathered from documents obtained because of the public disclosure requirements, without such information available services like this would disappear.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the FCC Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the FCC Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains.

As a consumer of long distance services, I rely on publicly available pricing information in order to make informed decisions about the telecommunications services I use. The FCC has recognized already in its October 1996 order, that a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousands of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information.

Traditionally consumers have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high-cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Without publicly available pricing information, I along with other consumers will be hard pressed to detect such impermissible price discrimination. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

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The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. I believe that this statement is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second, the advertising and promotional materials provided by carriers are not detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons. Moreover, these materials certainly will not be specific enough to allow consumers to detect--let alone support--a claim of carrier misconduct at the FCC. In short, the information available publicly without a specific Commission requirement will fall far short in meeting consumers' needs.

I support the Petition for Further Reconsideration filed by the Telecommunications Management Information Systems Coalition and urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,

*Kathleen DeVeto*

Kathleen L. DeVeto  
724 Lewelling #201  
San Leandro, CA 94579

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Lawrence Higa  
51 Telegraph Place  
San Francisco, CA 94131

January 14, 1998

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

Re: Policy and Rules Concerning the Interstate, Interexchange  
Marketplace;  
Implementation of Section 254 (g) of the Communications Act of 1934, as  
amended:  
CC Docket No. 96-61

Dear Ms. Salas:

I support the petition filed by the Telecommunications Management  
Information Systems Coalition Further Reconsideration of the Federal  
Communications Commission's decision to eliminate the requirement for  
long distance carriers to provide pricing and service information.

Being a consumer of telecommunications products & services I find it  
difficult to make an informed decision on which carrier I should choose.  
I found the Salestar Web Pricer invaluable in choosing my long distance  
carrier.

As a consumer of long distance services, I rely on publicly available  
pricing information in order to make informed decisions about the  
telecommunications services I need. As even the FCC recognized in its  
October 1996 order, a public disclosure requirement promotes the public  
interest by making it easier for consumers to compare service offerings.  
Thousand of long distance calling plans and services are now available  
to the public. If consumers are to be able to make any meaningful  
distinctions between these plans, they must have access to detailed and  
accurate information regarding the plans. The only way to ensure that  
consumers have access to the plans that they are interested in, as  
opposed to the particular plan that a carrier happens to be promoting at  
a particular time, is through an FCC-mandated public disclosure  
requirement. The FCC should not deny consumers access to this important  
information.

Consumers traditionally have served as the FCC's watchdogs over certain  
practices of the long distance industry. For example, the Communications  
Act prohibits carriers from charging consumers in rural and other high-  
cost areas higher rates than those charged to consumers in urban and  
other lower-cost areas. Absent the public availability of pricing  
information, however, consumers will be hard pressed to detect such

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impermissible price discrimination in the first instance. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. The is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second, the advertising and promotional materials provided by carriers are rarely detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons.

I urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,

*Lawrence Hysa*

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January 15, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation  
of Section 254 (g) of the Communications Act of 1934, as amended: CC Docket No. 96-61

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's (FCC) decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available telecommunication services to the public. I support this Petition.

Being a consumer of telecommunications products and services I find it difficult to make an informed decision as to which carrier I should choose. I found the Salestar Web Pricer helpful and informative in choosing my long distance carrier. Since this information is gathered from documents obtained because of the public disclosure requirements, without such information available services like this would disappear.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the FCC Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the FCC Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains.

As a consumer of long distance services, I rely on publicly available pricing information in order to make informed decisions about the telecommunications services I use. The FCC has recognized already in its October 1996 order, that a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousands of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information.

Traditionally consumers have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high-cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Without publicly available pricing information, I along with other consumers will be hard pressed to detect such impermissible price discrimination. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

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The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. I believe that this statement is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second, the advertising and promotional materials provided by carriers are not detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons. Moreover, these materials certainly will not be specific enough to allow consumers to detect--let alone support--a claim of carrier misconduct at the FCC. In short, the information available publicly without a specific Commission requirement will fall far short in meeting consumers' needs.

I support the Petition for Further Reconsideration filed by the Telecommunications Management Information Systems Coalition and urge the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Thank You,

*Dan M. Walker*  
87 BOLD ST #3  
S.F. CA 94114

OFFICE

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JAN 21 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

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Re: Policy and Rules Concerning the Interstate, Interexchange  
Marketplace;  
Implementation of Section 254 (g) of the Communications Act of 1934, as  
amended: CC  
Docket No. 96-61

Dear Ms. Salas:

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available services to the public. Fritz Companies, Inc. writes to support the Petition.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains.

Consumers of long distance services, both residential and small business, rely on publicly available pricing information in order to make informed decisions about the telecommunications services they need. As even the FCC recognized in its October 1996 order, a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousand of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information.

Consumers traditionally have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high-cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Absent the public availability of pricing information, however, consumers will be hard pressed to detect such impermissible price discrimination in the first instance. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints and the Commission.

The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. This is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second,

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the advertising and promotional materials provided by carriers are rarely detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons. Moreover, these materials certainly will not be specific enough to allow consumers to detect--let alone support--a claim of carrier misconduct at the FCC. In short, the information available publicly without a specific Commission requirement will fall far short of meeting consumers' need.

Fritz Companies, Inc. thus fully supports the Petition and urges the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Very truly yours,  
Chris Shayne  
Chris.Shayne@Fritz.com